

Claims 1-7, 10-12, 14-16, 18-28, 31-33 and 35-37 were rejected under 35 U.S.C. §103(a) as being obvious over Cohen et al. in view of Minter. This rejection is respectfully traversed and reconsideration is requested in view of the following.

The Examiner indicates that Cohen et al. discloses the maintaining of groups associated with an expert and a set of documents. The Examiner further indicates that Cohen et al. does not disclose utilization of threshold values associated with a user, but that Minter discloses calculation of scores using thresholds used to allocate friends for users, and that it would have been obvious to modify the teachings of Cohen et al. based on the teachings of Minter to arrive at the applicant's claimed invention.

Cohen et al. discusses methods for generating summaries of topics for a set of documents. The methods can include storing information about an "expert's" access to a document. Users can then use such information in an attempt to find information in the expert's area of expertise.

Minter discusses methods for identifying items of information that may be interesting to a user. Users may be paired as "friends" based on requests by each user for identical items of information. Items of information requested by one friend but not by the other friend may be identified for the other friend. Scores may be utilized in assigning a friend to a user, where the score is designed to indicate a correlation between the user and the potential friend, based on information that each has requested.

As such, Cohen et al. discusses methods for generating summaries of topics for a set of documents. Minter discusses a method for identifying information that may be interesting to a

user based on requests for information by another user determined to be correlate with the first user based on requested information. The “scores” referred to in Cohen et al. refer to an indication of correlation between users. As such, neither Cohen et al. or Minter, alone or in combination, discloses or suggests, as claimed by the applicant, among other things, assigning topics to documents or associating documents with topics, and maintaining an affinity variable for a user for each of the topics assigned to the a document associated with a user

The Examiner cites Cohen et al., Column 7, lines 48-58 with reference to the feature of applicant’s claim 1, “maintaining an affinity variable associated with the user for each of one or more of the topics assigned to a document attributed to the user”. The cited passage describes that if an “expert” belongs to a group, such as a department, then the expert may be associated with group data. As such, the cited passage does not disclose or suggest, among other things, maintaining an affinity variable, as claimed by the applicant.

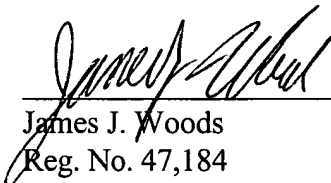
The Examiner asserts that the document summarizing methods of Cohen et al. can be combined with the information identification methods of Minter, in that methods of document summarizing methods of Cohen et al. methods of Cohen et al. could provide a ranking method to identify experts in the information identification methods of Cohen et al.. The applicant asserts, however, that the Examiner has not provided any indication or suggestion in the references or other prior art of how such document summarizing methods can be or should be used to rank such experts. Indeed, Cohen et al. does not even suggest ranking of experts at all. As such, the Examiner has failed to provide evidence of motivation to combine the references, or of how any teachings of the references could be combined.

For at least the above reasons, neither Cohen et al. or Minter, alone or in combination, teaches or suggests, as set forth in applicant's claims 1, 18, and 22, assigning topics to documents or associating documents with topics, and maintaining an affinity variable for a user for each of the topics assigned to a document associated with a user. Therefore, claims 1, 18, and 22 are patentable over the cited art. Furthermore, claims 2-17 and 19-21, and 23-38, which depend, either directly or indirectly from claims 1, 18, and 22, are also patentable over the cited references. Therefore, claims 1-38 are patentable over the cited references.

For all of the above reasons, the Applicant respectfully requests that the Examiner withdraw the rejection and the objection, and allowance of all the pending claims is respectfully solicited. To expedite prosecution of this application to allowance, the examiner is invited to call the applicant's undersigned representative to discuss any issues relating to this application.

Respectfully submitted,

Dated: April 6, 2004



James J. Woods
Reg. No. 47,184
BROWN RAYSMAN MILLSTEIN FELDER
& STEINER LLP
900 Third Avenue
New York, New York 10022
(212) 895-2000

I hereby certify that this paper is being deposited this date with the
U.S. Postal Service as First Class Mail addressed to: Mail Stop Non-Fee
Amendment, Commissioner for Patents, P.O. Box 1450
Alexandria, VA 22312-1450



James J. Woods



Date